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ATTORNEYS FOR PLAINTIFF EEOC

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION,

Plaintiff,

v.

GRESHAM NISSAN, INC.,

Defendant.

JEFFREY GOETZ,

Plaintiff,

v.

GRESHAM NISSAN, INC. and NICK SMIT,

Defendants.

No. CV 06-1373 BR

STIPULATED MOTION FOR
DISMISSAL AND ENTRY OF CONSENT
DECREE

The parties hereby stipulate that the above-entitled matter is fully compromised and settled as to any and all claims. The parties ask the Court to enter an order dismissing the lawsuit with prejudice and without costs or attorney's fees to any party. The parties further move the Court to approve and enter the Consent Decree entered into by the Equal Employment Opportunity Commission and Gresham Nissan, Inc., and that it be approved as the final decree of this Court in full settlement of this action. The parties request the Court to retain jurisdiction of this matter for purposes of enforcing the Consent Decree approved herein for a period of two years from the date the Court signs and order of dismissal.

RESPECTFULLY SUBMITTED this 30th day of November, 2007.

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PLAINTIFFS' JOINT MOTION FOR A PROTECTIVE ORDER (CV 06-1373 BR)
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Attorney for Defendants Gresham Nissan, Inc. and Nick Smit

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON**

CERTIFICATE OF SERVICE

I hereby certify that on November 30, 2007, I electronically filed the foregoing
“Stipulated Motion for Dismissal and Entry of Consent Decree” using the CM/ECF system
which will send notification of such filing to the following:

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Defendants’ Attorneys

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DATED this 30th day of November, 2007.

/s/ Damien A. Lee for
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